| AMY GAITANE and MAHASTI KOOSHA, |) | |
|--------------------------------------|---|--------------------------------|
| Individually and on Behalf of Others |) | |
| Similarly Situated, |) | 11 Civ. 2323 (WHP) |
| PLAINTIFFS, |) | |
| |) | MOTION TO ADMIT |
| V. |) | JANETTE WIPPER |
| EATON CORPORATION, ALFRED |) | PRO HAC VICE ON WRITTEN MOTION |
| VINCENZI, PATRICK FERRANG, and |) | on widthen motion |
| RONALD QUADE, |) | |
| DEFENDANTS. |) | |
| DEFENDANTS. |) | |

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Court for the Southern District of New York, I, Steven L. Wittels, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name:

Janette Wipper

Firm Name:

Sanford Wittels & Heisler, LLP

Address: City/State/Zip:

555 Montgomery St., Suite 1206 San Francisco, CA 94111

Phone Number:

(415) 391-6900

Fax Number:

(415) 391-6901

Janette Wipper is a member in good standing of the Bars of California, District of Columbia, and Texas. There are no pending disciplinary proceedings against Janette Wipper in any State or Federal court.

Case 1:11-cv-02323-WHP Document 4 Filed 04/28/11 Page 2 of 9

Dated:

April 20, 2011

City, State:

New York, NY

Respectfully submitted,

By: V V Steven L. Wittels (SLW-8110)

SANFORD WITTELS & HEISLER, LLP

1350 Avenue of the Americas

31st Floor

New York, NY 10019

Telephone: (646) 723-2947 Facsimile: (646) 723-2948

| AMY GAITANE and MAHASTI KOOSHA, |) |
|---|---|
| Individually and on Behalf of Others Similarly Situated, |)) 11 Civ. 2323 (WHP) |
| PLAINTIFFS, |) |
| v. | AFFIDAVIT OF STEVEN I WITTELS IN SUPPORT OF MOTION TO ADMIT |
| EATON CORPORATION, ALFRED |) JANETTE WIPPER |
| VINCENZI, PATRICK FERRANG, and |) PRO HAC VICE |
| RONALD QUADE, |) |
| DEFENDANTS. |) |

Steven L. Wittels, being duly sworn, hereby deposes and says as follows:

- 1. I am a partner of Sanford Wittels & Heisler, LLP, Counsel for Plaintiffs in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Janette Wipper as Counsel *pro hac vice* to represent Plaintiffs in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1984. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Janette Wipper since 2006.
- 4. Ms. Wipper is a Partner at Sanford Wittels & Heisler in San Francisco, CA.
- 5. I have found Ms. Wipper to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Janette Wipper, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Janette Wipper, pro hac

vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Janette Wipper, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Dated: April 19, 2011

City, State: New York, New York

Respectfully submitted,

Steven A. Wittels (SLW-8110)

Sworn to me this 19 day of April 2011.

Notary Public

DEEPIKA BAINS
Notary Public, State of New York
No. 029A6189484
Qualified in New York County
Commission Expires June 22, 2012

| AMY GAITANE and MAHASTI KOOSHA, |) |
|---|---|
| Individually and on Behalf of Others Similarly Situated, |)) 11 Civ. 2323 (WHP) |
| PLAINTIFFS, |)) |
| v. | ORDER FOR ADMISSION OF JANETTE WIPPER, ESQ PRO HAC VICE |
| EATON CORPORATION, ALFRED VINCENZI, PATRICK FERRANG, and | ON WRITTEN MOTION |
| RONALD QUADE, |) |
| DEFENDANTS. |) |

Upon the motion of Steven L. Wittels, attorney for Plaintiffs and others similarly situated, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Janette Wipper

Firm Name:

Sanford Wittels & Heisler, LLP

Address:

555 Montgomery St., Suite 1206

City/State/Zip:

San Francisco, CA 94111

Phone Number:

(415) 391-6900

Fax Number:

(415) 391-6901

is admitted to practice *pro hac vice* as Counsel for Plaintiffs and others similarly situated in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, Counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

| Dated: | | , 2011 | |
|--------------|--------------|---|---|
| City, State: | New York, NY | | |
| | | | |
| | | | |
| | | | |
| | | United States District/Magistrate Judge | _ |

| AMY GAITANE and MAHASTI KOOSHA, |) |
|--|-----------------------------------|
| Individually and on Behalf of Others Similarly Situated, |))) 11 Civ. 2323 (WHP) |
| PLAINTIFFS, |) |
| v. |) CERTIFICATE OF SERVICE |
| EATON CORPORATION, ALFRED VINCENZI, PATRICK FERRANG, and RONALD QUADE, |))) |
| DEFENDANTS. |) |

The undersigned attorney hereby certifies that on April 27, 2011, I caused a true and correct copy of the Motion to Admit Janette Wipper, Esq. *pro hac vice* to be served upon the following, via overnight mail:

G. Ross Bridgman Vorys, Sater, Seymour and Pease LLP 52 East Gay Street Columbus, OH 43215

Victor Leo General Counsel Eaton Corporation 1111 Superior Avenue Cleveland, OH 44114

Attorneys for Defendants

By:

Steven L. Wittels (SLW-8110)

SANFORD WITTELS & HEISLER, LLP

1350 Avenue of the Americas

31th Floor

New York, NY 10019

Telephone: (646) 723-2947 Facsimile: (646) 723-2948

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

April 4, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JANETTE L. WIPPER, #275264 was admitted to the practice of law in this state by the Supreme Court of California on January 19, 2011; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records



Pistrict of Columbia Court of Appeals Committee on Admissions 430 F Street, N.W. — Room 123 Mashington, P. C. 20001 202/879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

| JANETTE L. WIPPER | | | | | | |
|---|----|--|--|--|--|--|
| was on the 14^{TH} day of SEPTEMBER, 2001 | _ | | | | | |
| duly qualified and admitted as an attorney and counselor and | nc | | | | | |
| entitled to practice before this Court and is, on the dat | t∈ | | | | | |
| indicated below, an active member in good standing of this Bar. | | | | | | |

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 12, 2011.

JULMO A. CASTILLO Clerk of the Court